

City of Brisbane Open Space and Ecology Committee (OSEC) Comments on the Notice of Preparation (NOP for the Baylands Specific Plan Environmental Impact Report (EIR))

Sea Level Rise

Measures for dealing with anticipated sea level rise (SLR) include the proposed Visitacion Creek wetland and the elevation of buildings and other structures and features. Almost all such measures are based on what are termed "Medium-High risk SLR" for the years 2050 and 2100. It seems that the specific estimates for Medium-High risk SLR come from the State of California Sea-Level Rise Guidance, 2018 Update, which is referenced on page 424 of the Specific Plan. This Guidance is, as of 2023, over four years old and does not incorporate the most recent findings of sea-level rise science, which indicates that sea levels are likely to rise further and faster than was predicted a few years ago.

Scientists have often understated the extent of possible global warming and the severity of its consequences in official reports such as the IPCC Assessments (<https://www.nytimes.com/2019/11/08/opinion/sunday/science-climate-change.html>) because the assessments are subject to consensus requirements and political review. Recent studies suggest that IPCC projections probably understate the danger.

(<https://www.npr.org/2022/08/30/1120025637/zombie-ice-will-raise-sea-levels-more-than-twice-as-much-as-previously-forec>); (<https://www.sciencefriday.com/segments/antarctic-ice-shelves/>).

Thus, the whole spectrum of Sea-Level Rise risks seemingly should be shifted upward, so the Medium-High Risks incorporating the most recent science would be higher, perhaps considerably higher, than the 1.9 feet and 6.9 feet for 2050 and 2100, respectively. One of the above-referenced articles mentions possibly 15 feet of SLR by 2100!

- Shouldn't the measures proposed to address SLR (building "freeboard", space allocated to Visitacion Creek wetland) be re-evaluated and adjusted to account for the likelihood that SLR will be worse than previously expected?
- How will SLR, especially the larger-than-originally-expected SLR, affect the integrity of the cap over the landfill? The higher the sea level, the greater the weight and lateral pressure of seawater and the more likely is seawater intrusion and mixing with groundwater. Could it lift or breach the cap? I don't see any evidence that this possibility has been thoroughly studied in the case of the Baylands. See this *Los Angeles Times* article: <https://www.latimes.com/california/story/2020-08-17/sea-level-rise-flooding-inland-california>.
- If Hwy 101 needs to be raised to compensate for sea level rise, how does that affect the proposed grading and water movement in the Baylands?

Electrical facilities, renewable energy generation, and battery storage

- Per research, storage of batteries can cause toxic and combustible gases "off gassing." How will this be addressed? How will the disposal of batteries be handled?
- What challenges have other new developments with large solar farm and battery storage faced, and how have they been resolved?
- Confirm that no new fossil fuel infrastructure will be constructed and evaluate the potential to remove and replace with electric and existing on-site fossil fuel infrastructure (i.e. natural gas lines) requiring relocation or modification.

Transportation

- Approval of the Geneva overpass and extension requires other agency approvals; how will congestion on Bayshore and Tunnel be addressed if these approvals are not received? If the overpass is not viable, the development allocation should be adjusted to avoid gridlock.
- Given the limited parking, is there a way to enforce that garages are used for cars?
- How will the transportation system accommodate 19,000 workers considering that Bayshore Caltrain station is only available on Local routes (i.e. no express service) and both Caltrain and BART have limited coverage across the Bay Area?

Transportation/Cumulative Impacts

- Please consider the potential future development of Candlestick Point and the High Speed Rail Light Maintenance Facility. These two large projects are in planning phases and will have cumulative impacts on Transportation, the lagoon overpass, and the environmental impacts of this project.

Cumulative Impacts/Growth Inducing Impacts

- There will be considerable impact to 'old' Brisbane if the building height limits for the Baylands are considered precedent for future development in the city. Is there a way to ensure that the height limits only apply to the Baylands?
- How will the Quarry Development impact the Baylands Development - in particular, traffic?

Proposed Land Use

- Please re-evaluate the definition of "Open Space" and what is allocated towards the Open Space goal. For example, the parking lot for EV charging, solar panel arrays, the sewer lift station, paved bike paths, the Roundhouse community space and landscaping adjacent to buildings are currently counted as Open Space but should not be. "Open Space" and "Open Area" should be discussed separately and their proportions detailed. The EIR studies should utilize the City's definition of Open Space.
- The NOP references the California Air Resources Board (CARB) 2017 Climate Change Scoping Plan; an updated Scoping Plan was adopted in 2022 that should be used as the basis for evaluation.

Fire Station relocation

- Please address concerns on emissions and safety of the 1000 gallon above ground fuel tank as this is adjacent to other businesses. Evaluate the ability to convert to non-fossil fuels and on-site clean energy storage.

Water Supply

- The NOP states that the MOU with the Contra Costa Water District provides for 2500 acre-feet per year, plus or minus 20 percent. But the anticipated demand for potable water on the Baylands is less than half of that, or 1122 acre-feet/year. Why is over twice as much water as anticipated demand being contracted for? Is there some other potential source of demand that we haven't heard about but that is "back of mind"? An explanation is requested.
- Per SF Water representative at the NOP meeting on 5.8.23, the water supply agreement is tenuous. Please address this, including the implications and any alternatives.

Water, sewer, and drainage facilities

- Please describe the technology and power source to be used for the recycled water facility and system. Evaluate the potential capacity to expand the recycled water system to areas outside the Baylands (i.e. Crocker Industrial Park).

Approvals

- Required Approvals - consider adding more prerequisites for the Approval of Specific Plan - i.e., move several subsequent approvals of the BSP to the prerequisite category - i.e. Water, Geneva Overpass, etc...

Noise

- Pile driving during the construction phase of this project will have significant noise effects. Recent experience with pile driving at Sierra Point highlights that the sound will bounce off the mountain behind Brisbane to amplify the noise level. Please evaluate what mitigations (such as shrouds) can be employed during construction and their expected effectiveness.
- What are the noise pollution repercussions to having 20 story buildings up against the train lines? Please model these impacts along with the effectiveness of various mitigation strategies that could be employed.

Biological Resources

- Please evaluate the impact of glare from the solar array and whether it will need to be directed away from critical habitat and residential areas.

Hazards and Hazardous Materials

- The BSP states that 90% of the composite wood used in the Baylands will be formaldehyde free, but doesn't address other wooden building materials. Please address the use of pressure treated lumber, and evaluate the potential leaching of copper, arsenic and chromium.

Aesthetic Resources

- The height of rooftop solar is not included in the building heights proposed in Ch 3 of the BSP, however no mention is given of the allowed height of those installations or any setbacks of the solar installation from the edge of the roof. Please include this in the analysis of the aesthetic impacts of the Baylands project.

Greenhouse Gas Emissions

- Evaluate the embodied emissions in materials and how to minimize them. In particular, consider opportunities to reduce the carbon intensity of materials such as steel and cement.

Energy Resources

- Evaluate the maximum feasible on-site energy generation as well as the expected energy load of the site.
- Evaluate opportunities to utilize non-fossil fueled equipment during both construction and operations.